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Cindy Omid

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

United States of America,  
  
Plaintiff  
  
vs.  
  
Cindy Omid  
  
Defendant

Case No. CR 13-00739-SVW

**JOINT STIPULATION TO RETURN  
PASSPORT TO DEFENDANT CINDY  
OMIDI**

Plaintiff United States of America, by and through its attorneys of record, Assistant United States Attorneys Kristen Williams, and defendant Cindy Omid (“Omid”), by and through her counsel of record, Ryan D. Kashfian, hereby stipulate as follows:

1. As a condition of the appearance bond entered in this case, Mrs. Omid was required to surrender any passports she had to the clerk of the court, Dkt. 18, and Mrs. Omid surrendered her passport to pre-trial services.
2. On August 10, 2015, Mrs. Omid was sentenced to probation. Dkts. 442, 443.
3. In addition, on December 1, 2015, the court issued an order granting a money judgment forfeiture, Dkt. 467, and on February 3, 2016, Mrs. Omid satisfied the money judgment, Dkt. 474.
4. On February 7, 2017, the court issued a report and order terminating probation prior to original expiration date. Dkt. 496. The report found that Mrs. Omid had completed all of the requirements involving her sentencing and that she had met all of

1 the special conditions for probation as ordered by this court and stated that she was  
2 “discharged from supervision and the proceedings in the case be terminated.” *Id.*

3 5. On March 19, 2017, pre-trial services indicated that it will release the  
4 passport to Mrs. Omid on the court issuing an order approving pre-trial services to  
5 return the passport. Pre-trial services stated that Mrs. Omid is a US Citizen and that,  
6 unless the Court provides an order to return the passport to Mrs. Omid, pre-trial services  
7 in due course will forward the passport to the State Department. Pre-trial services has no  
8 objection to returning the passport to Mrs. Omid.

9 6. Accordingly, counsel respectfully request that the Court enter an order  
10 having pre-trial services return the passport to Mrs. Omid.

11 IT IS SO STIPULATED.

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13 DATED: March 13, 2017

KASHFIAN & KASHFIAN, LLP

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16 By: /s/ Ryan D. Kashfian

Ryan D. Kashfian  
Counsel for Defendant  
Cindy Omid

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19 DATED: March 13, 2017

KRISTEN WILLIAMS  
Assistant United States Attorney

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22 By: /s/Kristen Williams

Kristen Williams  
Counsel for Plaintiff  
United States of America